

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

EDWARD SARTORIS  
PLAINTIFF

CIVIL NO. 3:23-CV-640

v

(JUDGE MARIANI)

WARDEN HAIDLE, ET AL.  
DEFENDANTS

**FILED**  
**SCRANTON**

APR 25 2024

MOTION FOR AN ORDER  
COPELLING DISCOVERY

Per

CP

DEPUTY CLERK

PLAINTIFF MOVES THIS COURT FOR AN ORDER PURSUANT TO RULE 37(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE COMPELLING DEFENDANTS WARDEN HAIDLE AND DEPUTY WARDEN MCCOY TO PRODUCE FOR INSPECTION THE FOLLOWING DOCUMENTS: 1) WATER ANALYSIS OF UNTREATED WATER FOR THE PAST 3 YEARS 2) WATER ANALYSIS FOR THE TREATED WATER FOR THE PAST 3 YEARS 3) TESTING AND OUTCOME OF ANALYSIS OF CAULKING ON WINDOWS 4) WRITTEN PROCEDURE FOR REMEDIATION OF MOLD 5) WRITTEN PROCEDURE FOR TREATMENT OF EFFECTS OF LONG TERM EXPOSURE TO MOLD

AND ALL OTHER FILES, EMAILS, PROCEDURES, RECORDS AND POLICIES FOR ANYTHING RELATED TO ASBESTOS, PCBs, MOLD AND WATER TREATMENT/ANALYSIS AS DESCRIBED IN THE ATTACHED REQUEST FOR RECORDS.

PLAINTIFF SUBMITTED THE WRITTEN REQUEST FOR THESE DOCUMENTS PURSUANT TO RULE 34 OF THE FEDERAL RULES OF CIVIL PROCEDURE ON FEBRUARY 12<sup>TH</sup>, 2024 BUT HAVE NOT YET RECEIVED THE DOCUMENTS.

PLAINTIFF ALSO MOVES FOR AN ORDER PURSUANT TO RULE 37 (a) (4) REQUIRING THE AFORESAID DEFENDANTS TO PAY PLAINTIFF THE SUM OF \$37.<sup>00</sup> AS REASONABLE EXPENSES IN OBTAINING THIS ORDER, ON THE GROUNDS THAT THE DEFENDANTS' REFUSAL TO ANSWER THE INTERROGATORIES OR PRODUCE THE DOCUMENTS HAD NO SUBSTANTIAL JUSTIFICATION.

DATED: APRIL 19<sup>TH</sup>, 2024

RESPECTFULLY SUBMITTED,  
~~Edward Sartoris~~ PRO-SE  
EDWARD SARTORIS QP3887  
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